

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA

TINA NGUYEN CRUZ, *on behalf of herself
and others similarly situated,*

Plaintiff,

v.

KATE SPADE & COMPANY, LLC,

Defendant.

Case No. 2:19-cv-00952-APG-BNW

**JOINT STATUS REPORT AND
STIPULATION TO STAY DISCOVERY
FOR FIFTEEN DAYS OR UNTIL A
RULING ON KATE SPADE'S MOTION
TO DISMISS HAS BEEN ENTERED,
WHICHEVER OCCURS SOONER
(SECOND REQUEST)**

Compl. Filed: June 5, 2019
Trial Date: None Set

1

2

5

9

1

4

7

9

2

3

7

1 required by the Local Rules.

2 10. This request is made in good faith and the proposed stay will not cause prejudice to
3 either party. This is the parties' second request to stay discovery.

4 11. The parties reserve all rights regarding the propriety, scope, and timing of
5 discovery upon expiration of this proposed stay.

6 **IT IS SO STIPULATED AND REQUESTED, THROUGH THE BELOW COUNSEL**
7 **OF RECORD:**

8 Dated: February 24, 2020

Dated February 24, 2020

9 /s/ Walter R. Cannon
10 **OLSON, CANNON, GORMLEY, ANGULO**
11 **& STROBERSKI**
12 Walter R. Cannon (Nev. Bar No. 001505)
13 9450 West Cheyenne Avenue
14 Las Vegas, Nevada 89129

/s/ Miles N. Clark
KNEPPER & CLARK LLC
Matthew I. Knepper (Nev. Bar No. 12796)
Miles N. Clark (Nev. Bar No. 13848)
5510 S. Fort Apache Rd., Suite 300
Las Vegas, NV 89148-7700

13 By: _____
14 *Attorneys for Tapestry, Inc.*

By: _____
Attorneys for Tina Nguyen Cruz

15 Dated: February 24, 2020

Dated February 24, 2020

16 /s/ Bridget J. Russell
17 **SHEPPARD, MULLIN, RICHTER &**
18 **HAMILTON LLP**
19 P. Craig Cardon
20 (Cal. Bar. 168646, admitted *pro hac vice*)
Dylan J. Price (Cal. Bar No. 258896)
Bridget J. Russell (Cal. Bar. No. 288107)
1901 Avenue of the Stars, Suite 1600
Los Angeles, California 90067-6055

FINKELSTEIN THOMPSON LLP
Gordon M. Fauth, Jr.
(Cal. Bar No. 190280, admitted *pro hac vice*)
Hope E. Ranoa (Cal. Bar No. 298366)
15 Shattuck Square, Suite 245
Berkeley, CA 94704

21 By: _____
22 *Attorneys for Tapestry, Inc.*

FINKELSTEIN THOMPSON LLP
Mila Bartos (DC Bar No. 464227)
Rosalee B.C. Thomas (DC Bar No. 492770)
3201 New Mexico Ave., Suite 395
Washington, DC 20016
Phone: (202) 337-8000
Email: mbartos@finkelsteinthompson.com
Email: rbcthomas@finkelsteinthompson.com

23 By: _____
24 *Attorneys for Tina Nguyen Cruz*

IT IS ORDERED that ECF No. 32 is
GRANTED.

IT IS FURTHER ORDERED that the
parties must file a joint proposed discovery
plan and scheduling order by March 27,
2020 unless the case is dismissed in its
entirety before March 27, 2020.

IT IS SO ORDERED

DATED: February 25, 2020



BRENDA WEKSLER
UNITED STATES MAGISTRATE JUDGE